

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOHN MARK PATTERSON (06)

NO. 3:20-CR-00216-X

FACTUAL RESUME

In support of Patterson's plea of guilty to the offense in Count Three of the Indictment, Patterson, the defendant, Katherine Reed, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged Count Three of the indictment, charging a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), that is, Possession of Firearm by a Convicted Felon, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a firearm as charged;
- Second.* That before the defendant possessed the firearm, the defendant had been convicted in a court of a crime punishable by imprisonment for a term in excess of one year;
- Third.* That the defendant knew he had been convicted of such a crime at the time he possessed the firearm; and
- Fourth.* That the firearm possessed traveled in and affected interstate or foreign commerce; that is, before the defendant possessed the

¹ Fifth Circuit Pattern Jury Instruction 2.43D (5th Cir. 2015); *Rehaif v. United States*, __ S.Ct. __, 2019 WL 2552487 (U.S. June 21, 2019).

firearm, it had traveled at some time from one state to another or between any part of the United States and any other country.

STIPULATED FACTS

1. John Mark Patterson admits and agrees that, on or about February 4, 2020, in the Dallas Division of the Northern District of Texas, He did possess in and affecting interstate and foreign commerce a firearm, to wit: a Smith and Wesson, Model M&P, 9 millimeter, bearing serial number DTN4350, after having been convicted of a crime punishable by imprisonment for a term exceeding one year, and the defendant did so knowingly.

2. More specifically, on February 4, 2020, while in Dallas, Texas, Patterson was in possession of a firearm, to wit: a Smith and Wesson, Model M&P, 9 millimeter, bearing serial number DTN4350. As Patterson knew, he was a convicted felon at the time of the possession of this firearm. Law enforcement agents were able to determine that the firearm was in or affected interstate or foreign commerce by virtue of its presence in Dallas, Texas. Patterson admits that the firearm traveled in interstate commerce.

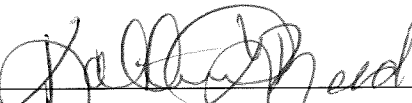
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3. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count Three of the Indictment.

AGREED TO AND STIPULATED on this 20th day of August, 2020.

ERIN NEALY COX
UNITED STATES ATTORNEY


JOHN MARK PATTERSON
Defendant


KATHERINE REED
Attorney for Defendant


P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia State Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Tel: 214-659-8680
Fax: 214-659-8812
Email: philip.meitl@usdoj.gov